



opponents, which is directly relevant to Carter's RLA, Duty of Fair Representation, and Title VII claims against Local 556."<sup>1</sup>

3. As such, the Court afforded Defendant Local 556 an opportunity provide a brief of the matter, limited to 7-pages, with Defendant SWA allowed to join. The brief was ordered due by Monday, June 21 at 5pm.
4. Early Monday morning, lead counsel for Local 556 rushed his infant daughter to the emergency room with respiratory issues. To date of this filing, the baby remains hospitalized and connected to oxygen machines. As lead counsel is in control of the briefing, it has not been finalized. Local 556 anticipates being able to submit briefing by Wednesday, June 23 at midnight.
5. All parties expressed they were unopposed with the extension on Monday, June 21. This request is not for delay, but in the name of equity and compassion.

Dated: June 21, 2022

Respectfully submitted,

/s/ Edward B. Cloutman, III

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**ATTORNEYS FOR DEFENDANT TWU LOCAL 556**

**CERTIFICATE OF CONFERENCE**

I hereby certify that the parties conferred on this motion via email on the morning of

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<sup>1</sup> Doc. No. 254 at 2.

Monday, June 20, 2022.

Adam S. Greenfield

/s/ Adam S. Greenfield

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been filed via the Court's ECF system and all counsel of record have been served on this 21<sup>st</sup> day of June, 2022.

/s/ Adam S. Greenfield  
Adam S. Greenfield